

THE HONORABLE BRIAN D. LYNCH
CHAPTER 13
HEARING DATE: October 23, 2019
HEARING TIME: 1:30 P.M.
LOCATION: Tacoma, Washington

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF WASHINGTON AT TACOMA**

In re: Case No.: 19-42296-BDL

GAYLE ELIZABETH OWENS,
OBJECTION TO CONFIRMATION WITH
STRICT COMPLIANCE

Debtor.

COMES NOW, Michael G. Malaier, Chapter 13 Standing Trustee, and objects to confirmation as follows:

BACKGROUND

Debtor filed this Chapter 13 case on July 12, 2019. The applicable commitment period is sixty months. The case is currently in the third month and the Meeting of Creditors has been completed. The bar date for filing non-governmental claims is November 5, 2019. Scheduled unsecured claims total \$51,817.00. Debtor proposes to pay at least \$27,307.90 to allowed nonpriority unsecured claims.

OBJECTION TO CONFIRMATION

Michael G. Malaier
Chapter 13 Standing Trustee
2122 Commerce Street
Tacoma, WA 98402
(253) 572-6600

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2 **OBJECTION**
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- 5 Schedules or other documentation insufficient: Trustee requires the following
6 information in order to complete his evaluation of this case.
7
- 8 (1) Two years of P&L statements from the debtor's business.
9
- 10 (2) Two years of bank statements for debtor's business.
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- 12 (3) Two years of state and federal tax returns, including all attachments and schedules.
13
- 14 (4) All invoices and evidence of amounts paid to debtor's business in the last two years.
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- 16 (5) Evidence of all claimed business expenses for the last two years.
17
- 18 (6) Evidence of the claimed "non-reimbursed work and travel expenses" for debtor's
19 spouse.

20 Other:

21 **WHEREFORE**, Trustee requests that the objection to confirmation be sustained and
22 debtor be ordered to file a motion to confirm a plan resolving the issues raised herein within 14
23 days of entry of the Order Sustaining Trustee's Objection to Confirmation; and to set the
24 hearing on the next available motion calendar after the 14 days expires. If the Motion to
25 Confirm resolving the Trustee's issues is not filed and set for hearing as outlined above, the
26 Trustee requests he be allowed to enter an order dismissing the case, *ex parte*, without notice.

27
28 **DATED** this 10th day of October, 2019.

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31 /s/ Matthew J.P. Johnson
32 Matthew J.P. Johnson, WSBA# 40476 for
33 Michael G. Malaier, Chapter 13 Trustee

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35 OBJECTION TO CONFIRMATION